

REMARKS

The comments of the applicant below are each preceded by related comments of the examiner (in small, bold type).

Claims 1-7, 9-25 and 27 rejected under 35 U.S.C. 103(a) as being unpatentable over Eder (USPN 6,321,205 B1, referred to as Eder), and further in view of Thomason (USPN 2005/0004786).

As to Claim 1, Eder discloses a machine-based method comprising in connection with a predictive model development project (Eder, C 39 L 40: components of all defined enterprises; Fig. 7, 50: Application Database; EN: an enterprise is a project) in which a user interacts with a computer application in a succession of steps to generate a predictive model (Eder, C 39 L 36: Predictive Model Specification) based on historical data about a system being modeled (Eder, C 23 L 09: based on historical information), the user's progress in developing the model having a state at each of the successive steps, automatically storing structured project information that captures a state of the project (Eder, C 25 L 52: state of each node; EN: nodes are associated with the enterprise (Eder, C 39 L 60: nodes for the network)) at each of the successive steps (Eder, C 07 L 04: major processing steps; Fig 1: The processing steps involve databases at successive steps that represent storage) in generating the model;

Eder does not teach: the successive steps of the project being re-entrant based on the stored structured project information so that the user can make revisions to the project without restarting the project.

However, Thomason teaches the successive steps of the project being re-entrant based on the stored structured project information so that the user can make revisions to the project without restarting the project (Thomason, 11 0058: modeling schemes ... handle re-entrant and recursive calls).

Eder and Thomason are from the same field of endeavor, model based systems. It would have been obvious to one of ordinary skill in the art to have modified Eder's model with re-entrant properties, for the benefit of being able to change model parameters at runtime.

The applicant disagrees. The method of claim 1 is for a predictive model development project in which *"a user interacts with a computer application in a succession of steps to generate a predictive model."* That is, claim 1 recites a method in a context in which there is a user engaged in a *predictive model development project*, and the model is generated by a *succession of steps* by the user interacting with a computer application.

This is very different from the context of Thomason, which has nothing to do with a predictive model, let alone with development of such a predictive model, or generating the model by a succession of steps by the user interacting with a computer application, or "the successive

steps of the *project* being reentrant.” What Thomason discusses is the model itself, not the project in which the user engages in steps to develop the model.

The “re-entrant” feature recited in claim 1 relates to the successive steps of the predictive model generation, not to the model that is generated. In other words, it is the successive steps of generating a predictive model that are re-entrant. The “re-entrant” that Thomason described relates to his model of function calls in a state machine, for which Thomason defines a re-entrant call to be a second client calling to a function when a first call to that function is not complete. As Thomason said:

Re-entrancy occurs when a first call to a function is incomplete and a second client makes a call to that function, typically on its own thread. (paragraph [0058])

Accordingly, Thomason did not describe and would not have made obvious “the successive steps of *the project* being re-entrant”, let alone “based on the stored structured project information”.

Claim 1 also recites that the successive steps are made re-entrant so that the user can *make revisions to the project* without restarting the project. Thomason had nothing to do with making “revisions” to a project. Thomason was dealing with re-entrant calls to a function.

Thus, Thomason did not describe and would not have made obvious “successive steps of the project being re-entrant based on the stored structured project information so that the user can make revisions to the project without restarting the project”, as recited by claim 1.

Neither Eder nor Thomason, alone or in combination, described or would have made obvious the features of claim 1.

Independent claims 11 and 20 contain similar features to those of independent claim 1 and are patentable for at least reasons similar to those discussed with respect to claim 1.

The dependent claims are patentable over Eder and Thomason for at least the same reasons discussed with respect to claims 1, 11, and 20, from which they depend.

Claims 8 and 26 are rejected under 35 U.S.C. 103(a) as being unpatentable over Eder (USPN. 6,321,205 B1, referred to as Eder) and Thomason, as applied to claims 1-7 above and further in view of Amado (USPN 5701400, referred to as Amado)

Claims 8 and 26 are patentable for at least the reasons discussed with respect to claims 1 and 20, from which they depend.

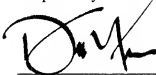
All of the dependent claims are patentable for at least similar reasons as those for the claims on which they depend are patentable.

Canceled claims, if any, have been canceled without prejudice or disclaimer.

Any circumstance in which the applicant has (a) addressed certain comments of the examiner does not mean that the applicant concedes other comments of the examiner, (b) made arguments for the patentability of some claims does not mean that there are not other good reasons for patentability of those claims and other claims, or (c) amended or canceled a claim does not mean that the applicant concedes any of the examiner's positions with respect to that claim or other claims.

Apply \$555 for the Petition for Extension of Time fee and any other charges or credits to deposit account 06-1050, referencing attorney docket no. 17146-0002001.

Respectfully submitted,



David L. Feigenbaum
Reg. No. 30,378

Date: _____

3/1/04

Fish & Richardson P.C.
225 Franklin Street
Boston, MA 02110
Telephone: (617) 542-5070
Facsimile: (877) 769-7945